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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 07-5944-JST

MDL No. 1917

This Document Relates To:

ALL DIRECT PURCHASER ACTIONS

**DECLARATION OF R. ALEXANDER  
SAVERI IN SUPPORT OF  
APPLICATION FOR ENTRY OF  
DEFAULT AGAINST DEFENDANTS  
IRICO DISPLAY DEVICES CO., LTD.  
AND IRICO GROUP CORPORATION**

1 I, R. Alexander Saveri, declare:

2 1. I am a partner with Saveri & Saveri, Inc., Lead Counsel for the Direct Purchaser  
3 Plaintiffs ("DPPs") in this action. I am a member of the Bar of the State of California and an  
4 attorney admitted to practice in the Northern District of California. I make this Declaration in  
5 Support of Plaintiff's Application for Entry of Default Against Defendants Irico Display Devices  
6 Co., Ltd. and Irico Group Corporation ("Irico" or "Irico Defendants"). If called as a witness, I  
7 could and would competently testify thereto.

8 2. On June 3, 2008, DPPs served on Irico a Summons, Complaint and other material  
9 pursuant to the Hague Convention Procedures and Rule 4 of the Federal Rules of Civil Procedure.  
10 (ECF No. 336.)

11 3. On June 24, 2008, Irico appeared through counsel Pillsbury. (ECF No. 308.)

12 4. On March 16, 2009, DPPs filed and served their Consolidated Amended Complaint  
13 ("CAC") on Irico. (ECF No. 436.)

14 5. On May 18, 2009, Irico, along with other defendants, filed a Joint Motion to  
15 Dismiss DPP's Consolidated Amended Complaint. (ECF No. 479.) On March 30, 2010, the Court  
16 denied Defendants' Motions to Dismiss and ordered defendants to answer DPPs' complaint within  
17 30 days. (ECF No. 665.)

18 6. The time limit for Irico to answer DPPs' CAC was April 29, 2010. That limit has  
19 not been extended by any agreement of the parties or any order of the Court. Irico has not filed or  
20 served an answer to DPPs' CAC.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 /s/ R. Alexander Saveri  
23 R. Alexander Saveri